

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION**

CYNTHIA B. SCOTT, *et al.*, )  
                                )  
                                )  
Plaintiffs,                 )  
                                )      Case No. 3:12-cv-00036-NKM  
v.                             )      Sr. Judge Norman K. Moon  
                                )  
HAROLD W. CLARKE, *et al.*, )  
                                )  
                                )  
Defendants.                 )  
                                )

**DECLARATION OF ANGEL TANNER**

1. My name is Angel Tanner. I am a 42-year-old woman and am incarcerated at the Fluvanna Correctional Center for Women (“FCCW”). I have personal knowledge of the facts in this declaration.
2. I have been at FCCW since March 2001, and my projected release date is in November 2026. I currently reside in the Prison Fellowship Wing in unit 2D. This wing is a Christian-based academy that encourages residents to build each other up and examine the root causes of their past behavior in order to develop a healthier world view.
3. On around February of 2022, I was in an exam room with Nurse Casen for a medical appointment after filing an emergency grievance. I was seated in front of the desk and saw a sign taped to the front of the desk. The sign threatened a disciplinary charge if anyone brought up a problem that was not the reason for the appointment.
4. The emergency grievance I filed was for a sharp pain in my neck. I have scoliosis and degenerative disc disease that isn’t being taken seriously by FCCW, and I suspected this

pain had something to do with these conditions. However, medical wrote an email to Nurse Casen before I was seen, saying that I was being seen for headaches. When I started talking to Nurse Casen about the pain in my neck, she threatened to give me a disciplinary charge because it wasn't what I had put on my emergency grievance. I insisted that she look at the grievance paper to confirm that I had asked to be seen for my neck. After she did that, she examined my neck and ultimately ordered x-rays. However, she wrote an order for me to be examined by an orthopedic doctor and this was overridden. Instead, I was told that physical therapy would help me exercise my muscles and help improve my spine. I think it is outrageous that I could have been disciplined for this.

5. Later I filed a sick call when I started having issues with my pulse. I have hyperthyroidism, which can increase my pulse when it's not controlled. I was concerned about this, especially since I have not had a chronic care appointment in more than a year. When I tried to mention my hyperthyroidism during my sick call appointment, Nurse Casen told me that she could only look at the pulse issue since that was what was written on my sick call. I am now afraid to bring up questions and related concerns during my sick call appointments, even though my symptoms cause me pain. I also have to make appointments almost weekly to be seen for my different concerns, rather than bringing them up in one appointment.
6. My friend Anna Stogoski, who also resides in unit 2D, told me that she was written a ticket and got a penalty under this policy after asking a question during an appointment. This has especially made everyone in my unit afraid to ask questions during appointments.

7. I regularly see Nurse Casen for appointments. She refuses to discuss or explain her treatment decisions to me. She also stays behind her desk and won't approach me to examine me. When I saw her about my neck pain, she just took pictures but didn't touch or physically examine me. She never has my chart open when I have appointments with her. My x-rays and lab results are not in my chart, which seems really thinned out.

8. Because of visiting restrictions due to COVID, I was unable to sign this declaration. However, it was read to me verbatim over the phone and I have verified that it is true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

/s/ ANGEL TANNER

April 4, 2022